

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

PCF INSURANCE SERVICES OF THE
WEST, LLC,

Plaintiff,

v.

JAMES FRITTS AND RI INSURANCE
SERVICES, LLC,

Defendants.

-and-

JAMES FRITTS, RI INSURANCE
SERVICES, LLC, a Washington limited
liability company, and CHICKEN DINNER
INC., a Washington corporation,

Counterclaim Plaintiffs,

v.

PCF INSURANCE SERVICES OF THE
WEST, LLC, a Delaware limited liability
company; PCF HOLDCO, LLC, a Delaware
limited liability company; JENNI LEE
CROCKER, an individual; and JEFF
HUTCHINS, an individual;

Counterclaim Defendants.

Case No. 2:23-cv-01468

STIPULATED MOTION AND
~~[PROPOSED]~~ ORDER REGARDING
CERTAIN DEADLINES AND
FORTHCOMING CROSS-MOTIONS
FOR SUMMARY JUDGMENT

STIPULATED MOTION AND ~~[PROPOSED]~~
ORDER REGARDING CERTAIN
DEADLINES AND FORTHCOMING CROSS-
MOTIONS FOR SUMMARY JUDGMENT –
2:23-CV-01468

ORRICK, HERRINGTON & SUTCLIFFE LLP
401 Union Street, Suite 3300
Seattle, Washington 98101
+1 206 839 4300

1 WHEREAS, pursuant to the Civil Trial Scheduling Order entered by the Court
 2 in this action on January 22, 2024 (the “Scheduling Order,” ECF No. 48), discovery must be
 3 completed by February 24, 2024;

4 WHEREAS, pursuant to the Scheduling Order, dispositive motions must be
 5 filed by March 25, 2025; and

6 WHEREAS, subject to the Court’s approval, counsel for the parties have agreed
 7 to a brief extension of the discovery period solely to complete the targeted discovery specified
 8 below and have agreed upon certain procedures and deadlines governing briefing on
 9 anticipated motions for summary judgment.

10 IT IS HEREBY STIPULATED AND AGREED, by and between the
 11 undersigned counsel, that:

- 12 1. Defendants may take the deposition of Joseph Tejeda via videoconference on
 13 February 28, 2025 starting at 10:00 AM PST for a total of 5 hours on the
 14 record.
- 15 2. Defendants may take the deposition of PwC on a date before March 3, 2025
 16 that is mutually agreeable to the parties and PwC.
- 17 3. The parties shall exchange opening expert reports, if any, on February 17, 2025.
- 18 4. The parties shall exchange rebuttal expert reports, if any, on March 10, 2025.
- 19 5. The parties shall complete expert depositions no later than March 24, 2025.
- 20 6. The deadline to file any motion for summary judgment shall be extended by ten
 21 days to April 3, 2025.
- 22 7. If any party files a motion for summary judgment, briefing on such motion shall
 23 comprise:
 - 24 a. An opening brief containing no more than 14,000 words;
 - 25 b. An answering brief, which must be filed no later than twenty-eight
 26 (28) days after filing of the opening brief, containing no more than
 27 14,000 words; and

c. A reply brief, which must be filed no later than fourteen (14) days after filing of the answering brief, containing no more than 8,000 words.

8. The parties may file any brief referenced in paragraph 7, *supra*, as well as any confidential exhibits filed therewith, under seal in the first instance. Within five (5) days thereafter, the filing party or parties shall propose a public version of such brief to the non-filing party or parties, who shall then provide additional redactions, if any, within five (5) days thereafter. The filing party shall then file a public version of the brief, containing all parties' proposed redactions, on the docket in the above-captioned action.

9. Nothing in this Stipulation shall prejudice any party's ability to challenge the confidential treatment of any redacted portion of any brief referenced in paragraph 8, *supra*, by motion after the filing of such redacted public brief.

IT IS SO STIPULATED.

DATED: February 18, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: s/Mark S. Parris
Mark S. Parris (WSBA No. 18370)
mparris@orrick.com

By: s/Bryn R. Pallesen
Bryn R. Pallesen (WSBA No. 57714)
bryn.pallesen@orrick.com
401 Union Street, Suite 3300
Seattle, WA 98101
Telephone: +1 206 839 4300
Facsimile: +1 206 839 4301

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
LLP

By: s/Cliff C. Gardner
Cliff C. Gardner (*Pro Hac Vice*)
Cliff.Gardner@skadden.com

By: s/Paul J. Lockwood
Paul J. Lockwood (*Pro Hac Vice*)
Paul.Lockwood@skadden.com

By: s/Elisa M.C. Klein
Elisa M.C. Klein (*Pro Hac Vice*)
Elisa.Klein@skadden.com

By: s/Matthew P. Majarian
Matthew P. Majarian (*Pro Hac Vice*)
Matthew.Majarian@skadden.com
One Rodney Square, 920 N. King Street
Wilmington, DE 19801
Telephone: +1 302 651 3000
Facsimile: +1 302 651 3001

*Attorneys for Plaintiff / Counterclaim Defendant
PCF Insurance Services of the West, LLC and
Counterclaim Defendants PCF Holdco, LLC, Jenni
Lee Crocker, and Jeff Hutchins*

PAUL HASTINGS LLP

By: /s/ Bradley J. Bondi
Bradley J. Bondi (*Pro Hac Vice*)
bradbondi@paulhastings.com

/s/ John S. Darden
John S. Darden (*Pro Hac Vice*)
jaydarden@paulhastings.com

/s/ Ronald K. Anguas
Ronald K. Anguas (*Pro Hac Vice*)
ronaldanguas@paulhastings.com

/s/ Neil J. Schumacher
Neil J. Schumacher (*Pro Hac Vice*)
neilschumacher@paulhastings.com
2050 M Street NW
Washington, DC 20036
Phone: (202) 551-1700
Facsimile: (202) 551-0201

BYRNES KELLER CROMWELL

/s/ Bradley S. Keller

Bradley S. Keller, WSBA #10665
bkeller@byrneskeller.com

/s/ Josh Selig

Josh Selig, WSBA #39628
jselig@byrneskeller.com
1000 Second Avenue, 38th Floor
Seattle, WA 98104
Phone: (206) 622-2000
Facsimile: (206) 622-2522

*Attorneys for Defendants/Counterclaim Plaintiffs
James Fritts and RI Insurance Services, LLC and
Counterclaim Plaintiff Chicken Dinner Inc.*

ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED: February 19, 2025



The Honorable John C. Coughenour
UNITED STATES DISTRICT JUDGE